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*Motion pro hac vice granted 9/9/11.
**Motion pro hac vice granted 6/11/12.
***Motion pro hac vice granted 2/1/16.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
HELENA DIVISION

<p>Lair, et al.,</p> <p><i>Plaintiffs,</i></p> <p>v.</p> <p>Jonathan Motl, et al.,</p> <p><i>Defendants.</i></p>	<p>Case No. 6:12-cv-00012-CCL</p> <p>Declaration of Wesley Prouse</p>
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I, Wesley Prouse, make the following declaration pursuant to 28 U.S.C.

DECLARATION OF
WESLEY PROUSE

§ 1746:

1. I am over eighteen years of age and my statements set forth below are based on personal knowledge.

2. In 1996, I successfully ran for House District 15. During my tenure as a representative, I voted consistent with my pro-life, pro-right to work, pro-gun beliefs.

3. In 2010, I unsuccessfully ran for Senate District 23. During that campaign, I used Direct Mail for my campaign literature.

4. I am aware that Direct Mail did candidate profiles and chose their clients based on responses.

5. I did not authorize any National Right to Work, American Tradition Partnership, or Western Tradition Partnership spending to aid in my election, nor did I know of any such spending at the time. I never met with National Right to Work, American Tradition Partnership, or Western Tradition Partnership, or their agents for the purpose of being vetted.

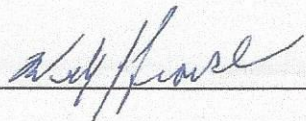
6. I never made an arrangement, explicit or implied, with Western Tradition Partnership, American Tradition Partnership, National Right to Work, or Direct Mail that, in exchange for any efforts to get me elected, I would act in an official government capacity at their direction as a public official.

7. My association with Direct Mail existed because we were like-minded. I was pro-life, pro-right to work, and pro-gun before running for election in 2010. This is further evidenced by the way I voted in 1996.

8. On January 23, 2014, Commissioner Motl notified me that he had expanded a complaint filed with his office to include campaign violations against me, and on March 31, 2014, the Commissioner issued a sufficiency finding against me. On April 4, 2014, Commissioner Motl served me with complaint filed in state court. None of these documents made an allegation of quid pro quo corruption. Instead, I first became aware of the quid pro quo allegation on January 5, 2016, when a default judgment was entered against me. I chose to not fight the accusations because I saw others spending a lot of money to no avail.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on April 1, 2016.



Wesley Prouse
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